

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

V.

T-MOBILE US, INC.; LAYER3 TV, INC.; L3TV DALLAS CABLE SYSTEM, LLC; METROPCS TEXAS, LLC; T-MOBILE LICENSE LLC; T-MOBILE USA, INC.; T-MOBILE WEST LLC; T-MOBILE WEST TOWER LLC; IBSV LLC; THEORY MOBILE, INC.; T-MOBILE PCS HOLDINGS LLC; T-MOBILE RESOURCES CORPORATION; and T-MOBILE SUBSIDIARY IV CORPORATION

Defendants.

**§ 87(2)(b)**

Case No. 2:20-CV-281- JRG

# JURY TRIAL DEMANDED

## **PLAINTIFF'S UNOPPOSED MOTION TO WITHDRAWAL OF COUNSEL**

Plaintiff Kaifi, LLC ("Plaintiff") respectfully requests that, due to change of business, Michael J. Song be permitted to withdraw as counsel of record for Plaintiff in this matter. Parker Bunt & Ainsworth; Nixon Peabody LLP; Irell & Manella; and LTL Attorneys LLP will continue to represent Plaintiff. Defendants do not oppose this motion.

Dated: August 24, 2021

*/s/ Robert Christopher Bunt*

Michael J. Song  
(CA SBN 243675) (admitted E.D. Texas)  
Email: [msong@munckwilson.com](mailto:msong@munckwilson.com)  
Munck Wilson Mandala, LLP  
1925 Century Park East, Ste 2300  
Los Angeles, CA 90067-2724  
(310) 601-1118  
Fax: (972) 628-3616

Robert Christopher Bunt  
Texas Bar No. 00787165  
PARKER, BUNT & AINSWORTH PC  
100 E. Ferguson St., Suite 418  
Tyler, Texas 75702

Telephone: (903) 531-3535  
Email: rcbunt@pbatyler.com

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed electronically on August 24, 2021, pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

/s/ Robert Christopher Bunt  
ROBERT CHRISTOPHER BUNT

**CERTIFICATE OF CONFERENCE**

I hereby certify that, on August 6, 2021, Michael J. Song, conferred with Defendants' counsel, Melissa Smith, via e-mail and in accordance with Local Rule CV-7(h) concerning the withdrawal of Michael J. Song as counsel of record for Plaintiff in this matter. On August 6, 2021, Defendants' counsel indicated that Defendants are unopposed to the motion.

/s/ Robert Christopher Bunt  
ROBERT CHRISTOPHER BUNT

